

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)
)
)
Plaintiff,)
)
vs.) No. 25-CR-879 JB
)
)
HERIBERTO SALAZAR-AMAYA, et al.,)
)
Defendants.)

AMENDED¹ NOTICE TO COURT REGARDING POSITION OF
DEFENSE COUNSEL TO THE UNITED STATES' MOTION TO DECLARE CASE
COMPLEX, AND MOTION FOR PROTECTIVE ORDER

The United States of America, through its undersigned counsel, hereby notified the Court of the position of defense counsel on two pending motions filed by the United States; a Motion to Declare this Case Complex², Doc.153; and 2) Motion for Protective Order, Doc. 155. This notice is filed in anticipation of the hearing currently scheduled on June 12, 2025, on these matters.

Defendant by Defense Counsel	Motion	Concurs	Objects	Takes No Position
Salazar-Amaya by Michael Severo	Declare Complex Protective Order	X X		
Acuna-Moreno by Marshall Ray	Declare Complex Protective Order	X		X
Anesi by Diego Esquibel	Declare Complex Protective Order	X		X
Montoya by Susan Burgess-Farrell	Declare Complex Protective Order			X X
Sedillo by Paul Linnenburger	Declare Complex Protective Order	X		X
Navarette-Ramirez by Phillip Sapien	Declare Complex Protective Order	X	X	

¹ Amended to include the position of Michael Severo on behalf of Heriberto Salazar-Amaya.

² Should the United States' Motion to Declare Case Complex be granted, the United States' Motion to Extend Discovery Deadlines, Doc. 154, will be rendered moot.

Defendant by Defense Counsel	Motion	Concurs	Objects	Takes No Position
Garcia by Jon Stanford	Declare Complex Protective Order	X		X
Lopez-Altamirano by Greg Acton	Declare Complex Protective Order	X		X
Martinez by Nicholas Hart	Declare Complex Protective Order		X X	
Singer by Joseph Shattuck	Declare Complex Protective Order	X X		
Tanner by Tom Clark	Declare Complex Protective Order	X X		
Young by Carey Bhalla	Declare Complex Protective Order		X	No position provided
Marquez by Tim Cornish	Declare Complex Protective Order	X	X	
Sanchez by John Anderson	Declare Complex Protective Order	X		X
DEFENDANTS TO BE ADDED BY SUPERSEDING INDICTMENT				
Lopez-Rubio by M. Naomi Salazar	Declare Complex Protective Order		X X	
Herrera by Mallory Gagen	Declare Complex Protective Order		X	X
Lovato by Todd Coberly	Declare Complex Protective Order	X		X
TOTALS	Declare Complex Protective Order	11 4	5 3	1 9 1 (no position Provided)

Respectfully submitted,

RYAN ELLISON
United States Attorney

Electronically filed on June 12, 2025

MATTHEW MCGINLEY
RAQUEL RUIZ-VELEZ
BLAKE NICHOLS
ELAINE Y. RAMÍREZ
Assistant United States Attorneys
Post Office Box 607
Albuquerque, New Mexico 87103
(505) 346-7274

CERTIFICATE OF SERVICE

I hereby certify that on June 12, 2025, I filed the foregoing document electronically through the CM/ECF system. Pursuant to the CM/ECF Administrative Procedures Manual, §§ 1(a), 7(b)(2), such filing is the equivalent of service on parties of record.

Electronically filed on June 12, 2025

Elaine Y. Ramírez
Assistant United States Attorney